

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHICKEN SOUP FOR THE SOUL
ENTERTAINMENT, INC., *et al.*,

Debtors.¹

Chapter 7

Case No. 24-11442 (MFW)

(Jointly Administered)

GEORGE L. MILLER, CHAPTER 7 TRUSTEE

Plaintiff.

v.

WILLIAM J. ROUHANA, JR., AMY L.
NEWMARK, CHRISTOPHER MITCHELL,
FRED M. COHEN, COSMO DENICOLA,
MARTIN POMPADUR, CHRISTINA WEISS
LURIE, DIANA WILKIN, VIKRAM
SOMAYA, JASON MEIER, AMANDA R.
EDWARDS, CHICKEN SOUP FOR THE
SOUL PRODUCTIONS, LLC, CHICKEN
SOUP FOR THE SOUL, LLC, CHICKEN
SOUP FOR THE SOUL HOLDINGS, LLC,

Defendants.

Adversary No. 25-50399 (MFW)

Re: Adv. D.I. 1

**MOTION OF THE INDEPENDENT DIRECTORS
TO DISMISS ADVERSARY COMPLAINT**

Pursuant to Rules 8, 9(b) and 12(b)(6) of the Federal Rule of Civil Procedure, made

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number (where applicable), are: 757 Film Acquisition LLC (4300); Chicken Soup for the Soul Entertainment Inc. (0811); Chicken Soup for the Soul Studios, LLC (9993); Chicken Soup for the Soul Television Group, LLC; Crackle Plus, LLC (9379); CSS AVOD Inc. (4038); CSSESIG, LLC (7150); Digital Media Enterprise, LLC; Halcyon Studios, LLC (3312); Halcyon Television, LLC (9873); Landmark Studio Group LLC (3671); Locomotive Global, Inc. (2094); Pivotshare, Inc. (2165); RB Second Merger Sub LLC (0754); Redbox Automated Retail, LLC (0436); Redbox Entertainment, LLC (7085); Redbox Holdings, LLC (7338); Redbox Incentives LLC (1123); Redwood Intermediate, LLC (2733); Screen Media Films, LLC; Screen Media Ventures, LLC (2466); and TOFG LLC (0508).

applicable to this adversary proceeding by Rules 7008, 7009, and 7012 of the Federal Rules of Bankruptcy Procedure, Defendants Fred M. Cohen, Cosmo DeNicola, Christina Weiss Lurie, Martin Pompadur, Vikram Somaya, and Diana Wilkin (collectively, the “Defendants”), by and through the undersigned counsel, hereby move to dismiss (this “Motion to Dismiss”) the *Complaint for (I) Breach of Fiduciary Duty; (II) Aiding and Abetting Breach of Fiduciary Duty; (III) Avoidance of Fraudulent Transfers; (IV) Recovery of Illegal Dividends; (V) Damages for Non-Payment of Employee Wages, Benefits and Payroll Taxes; (VI) Equitable Subordination; and (VII) Disallowance of Claims* [A.D.I. 1] (the “Complaint”). In support of this Motion to Dismiss, the Defendants have contemporaneously filed, and incorporate herein by reference, *The Independent Directors’ Opening Brief in Support of Motion to Dismiss Adversary Complaint*. Pursuant to Rule 7008-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware, the Defendants do not consent to the entry of a final order or judgment by the Court in this adversary proceeding if it is determined that the Court, absent consent of the parties, cannot enter a final order or judgment consistent with Article III of the United States Constitution.

Dated: July 11, 2025

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